

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Review of the Section 251 Unbundling)	
Obligations of Incumbent Local Exchange)	CC Docket No. 01-338
Carriers)	
)	
Implementation of the Local Competition)	
Provisions of the Telecommunications Act of)	CC Docket No. 96-98
1996)	
)	
Deployment of Wireline Services Offering)	CC Docket No. 98-147
Advanced Telecommunications Capability)	

AFFIDAVIT OF ARLIN B. GOLDBERG

1. I, Arlin B. Goldberg, certify that the following is my true testimony. I am Executive Vice President of Information Technology at Eschelon Telecom, Inc. (“Eschelon”). Prior to joining Eschelon in October 1996, I was the Director of Information Services at Frontier Telecommunications, Inc. I received my BSB degree in Accounting from the University of Minnesota.

2. Approximately one half of Eschelon’s customers are served by a platform product that Eschelon purchases from Qwest (“UNE-P”). The availability of UNE-P gives Eschelon a much larger customer base that it would otherwise have. This larger customer base permits Eschelon to make investments in ordering, provisioning, customer care, and billing software, data storage, and computer hardware systems that Eschelon would otherwise not invest in. These investments result in automation that lowers our costs of doing business, provided that our business is large enough.

3. For example, Eschelon is considering an investment in electronic billing presentation software. While it is starting to be the case that some customers demand electronic bills, many of our small business customers want paper bills. Only a certain percentage of customers will demand or accept electronic billing. Electronic billing has the potential to reduce our billing costs significantly, but only if sufficient numbers of customers subscribe to it. With the larger customer base that UNE-P gives us, I can justify the investment in this software.

4. Another example is investment in EDI or electronic data interfaces with the ILEC. EDI gives Eschelon the ability to reduce its ordering costs and to reduce provisioning problems introduced when ILEC or Eschelon employees make errors keying our orders. However, EDI will only lower Eschelon's costs if the large fixed costs involved are spread over a sufficient number of orders. Without UNE-P orders, Eschelon could not economically justify investing in EDI at this time.

5. In general, the larger the volume of transactions Eschelon must process, the more we invest in automating those processes. The volume of UNE-P transactions was a significant contributing factor in Eschelon's IT capital budget of \$4.8 million in 2001.

FURTHER AFFIANT SAYETH NOT.

Dated this 4th day of April, 2002.

/s/ Arlin B. Goldberg
Arlin B. Goldberg

Subscribed and sworn to before me
this 4th day of April, 2002.

/s/ Tobe L. Goldberg
Notary Public
My Commission Expires: January 31, 2005